ENTACT
environmental action in waste management

Thomas Alcamo
U.S.EPA
Region 5
77 West Jackson
Chicago, Illinois 60604

Re: Treatment and Disposal of Baghouse Materials

Dear Mr. Alcamo:

This letter serves to present the decontamination/demolition procedures which will be used to manage the K069 waste and minimize the amount of K069-impacted debris generated at the Master Metals site in Cleveland, Ohio. Currently, there is approximately 600 tons of emission control dust from secondary lead smelting (K069) left in the former baghouse. In addition, it is estimated that there exists approximately 100 tons of K069-impacted hazardous debris. This debris exists as the remnants of the former baghouse which was used to collect the K069 dust.

The baghouse structure is a brick/masonry exterior surface with a cinder block interior surface. The interior cinder block wall is distinguishable from the brick/masonry outer wall both physically and spatially. The interior block materials extend to the top of the inside of the baghouse and are mortared. It is clear from this information that the cinder block is the only material which has been K069-impacted. The outer wall brick/masonry material has not been impacted by the K069 collected within the baghouse.

Based on this information, ENTACT is preparing to decontaminate/demolish the baghouse edifice as follows:

All K069 baghouse dust will be removed through vacuum into containers which are suitable for transportation and disposal of this listed waste. No on-site treatment will be done on this material.

The outer wall brick/masonry material will be tested for TCLP lead to determine if the exterior brick material is hazardous for the toxicity characteristic for lead. If the material is found to exhibit the toxicity characteristic concentrations of lead greater than 5 mg/L (D008), then the brick material will either be a)abrasion blasted and tested to ensure that the brick material no longer exhibits the toxicity characteristic for lead so that it may be disposed as conventional construction debris, or b) disposed of as D008 hazardous waste at an appropriate hazardous waste treatment, storage, and disposal facility.

The inner wall cinder block material which has been K069-impacted will be treated in

accordance with 40 CFR § 268.45(b)(2) which states "The contaminants subject to treatment for debris that is contaminated with a prohibited listed hazardous waste are those constituents for which treatment standards are established for the waste under § 268.40." As specified in Table 1 of § 268.45, ENTACT will be utilizing abrasive blasting as the alternate treatment standard for the K069-impacted cinder block walls. Once the performance standard of removing the 0.6 cm of the surface layer of the cinder block has been achieved, the material will be tested for TCLP lead and TCLP cadmium. If the material does not exhibit the toxicity characteristic for these two metals, the building will be demolished and the material will be sent to a Subtitle D landfill as demolition debris. If the material exhibits the toxicity characteristic for either of these metals, then ENTACT will either a) retreat the material until it does not exhibit these toxicity characteristics, or b) demolish the building and send the hazardous debris to an appropriate treatment facility. The residues resulting from the abrasion blasting of the interior cinder block and exterior brick will be managed as K069 and D008, respectfully.

If you have any questions, please contact either myself or Dean Pisani at (630) 616-2100.

Respectfully,

Michael DeRosa
ENTACT, Inc.

cc: Bart Ray, OEPA